



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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AAS:HAB  
F. #2015R01787

271 Cadman Plaza East  
Brooklyn, New York 11201

October 16, 2018

**By Email and ECF**

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Re: United States v. Dan Zhong and Landong Wang  
Criminal Docket No. 16-614 (DLI)

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Dear Counsel:

As discussed at the status conference on October 3, 2018, the government is providing, on a rolling basis, relevant returns from recently executed email search warrants. Enclosed is a disc Bates-stamped DZ067471 containing certain relevant returns. Also enclosed is a disc containing English translations, Bates-stamped TR002258-TR002586, of certain Chinese-language materials contained in the disc Bates-stamped DZ067471. A chart is also attached for counsel's reference in identifying the source document of each included translation. All of these materials have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37).

The government renews its request for reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

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Enclosures (67471) (TR002258-TR002586)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)